

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

May 6, 2022

The Honorable George B. Daniels  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street New York, NY 10007

The Honorable Sarah Netburn, U.S. Magistrate Judge  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, NY 10007

**SO ORDERED:**

*George B. Daniels*  
George B. Daniels, U.S.D.J.

Dated: MAY 19 2022

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels and Magistrate Judge Netburn:

The undersigned members of the Plaintiffs' Executive Committees write on behalf of the plaintiffs on the Consolidated Amended Complaint against Sudan ("Sudan CAC Plaintiffs") regarding the Report and Recommendation ("R&R") of Magistrate Judge Netburn entered on the ECF at Docket Entry No. 7942 to request that the Court grant the parties an extension from 14 days to 30 days (until June 2, 2022) to file any application for reconsideration or any objections.

The parties are presently assessing the R&R to determine what issues, if any, should be raised for the Court's attention either for reconsideration or through an objection. The additional time is necessary due to a number of other ongoing events in the MDL and other obligations of members of the PECs over the next few weeks. The undersigned members of the PECs, for the Sudan CAC Plaintiffs, have consulted with counsel for Sudan and they have advised that Sudan does not object to this request, provided that it is reciprocal.<sup>1</sup>

Respectfully submitted,

COZEN O'CONNOR

MOTLEY RICE LLC

By: /s/ Sean P. Carter

By: /s/ Robert T. Haefele

<sup>1</sup> Counsel for the plaintiffs in the *Ashton* complaint were also consulted and did not oppose the request for the extension but declined to join the request.

The Honorable George B. Daniels  
The Honorable Sarah Netburn  
May 6, 2022  
Page 2

---

SEAN P. CARTER  
COZEN O'CONNOR  
One Liberty Place  
1650 Market Street, Suite 2800  
Philadelphia, Pennsylvania 19103  
Tel.: (215) 665-2105  
Email: [scarter@cozen.com](mailto:scarter@cozen.com)  
For the Plaintiffs' Exec. Committees

ROBERT T. HAEFELE  
MOTLEY RICE LLC  
28 Bridgeside Boulevard  
Mount Pleasant, SC 29465  
Tel.: (843) 216-9184  
Email: [rhaefe@motleyrice.com](mailto:rhaefe@motleyrice.com)  
For the Plaintiffs' Exec. Committees

cc: All Counsel of Record via ECF